



STATE OF WASHINGTON

**DEPARTMENT OF SOCIAL AND HEALTH SERVICES
P.O. Box 45040, Olympia, Washington 98504-5010**

February 15, 2008

Richard Klarberg
President and CEO
Council On Accreditation
120 Wall Street, 11th Floor
New York, NY 10005

RE: Clarification regarding the Council on Accreditation (COA) approach to Washington's accreditation process.

Dear Mr. Klarberg:

I received your letter of today's date notifying Children's Administration that the Council on Accreditation (COA) was placing the accreditation process we have been engaging in with COA on hold. Your letter indicated that Children's Administration had not provided you with a written communication following a meeting you and I had on December 7, 2007. By coincidence, we were just about to send you a letter, most of which has been incorporated into this response.

We disagree with your decision to place the accreditation process on hold. This decision is inconsistent with past communications and commitments from COA to the Children's Administration and, quite frankly, appears to be a reaction to outside pressure, not a measured response to our past history of working together and our proven commitment to improving child welfare practice in the state of Washington. In recent months, COA's position on the issues confronting us has shifted significantly and it remains unclear to us why this has occurred or what is driving this change.

In your letter, you state that COA has the discretion to place an agency's accreditation process on hold "when conditions exist that raise a serious concern about stakeholder health or safety or the credibility of COA's accreditation process." However, your letter fails to provide any compelling examples of how either criterion applies. Despite our recent communications and meetings on the accreditation process, you raise some issues for the first time in today's letter.

You also state that of additional concern to COA is our ongoing involvement in litigation "that is centered on issues directly related to the non-compliance with COA's standards of best practice." That this is even raised is of concern to us. Please clarify this statement from your letter, both as to how exactly it is a concern to COA and how it relates to your decision to place the accreditation process on hold.

As you know, Children's Administration has been a party to a settlement agreement in the Braam case since 2004. Recently the plaintiffs in the case have filed an enforcement proceeding on some specific issues. The matter is pending and has yet to be heard by the court, much less decided or resolved. Is it your position that simply because a party in pending litigation alleges that the Department falls short of a COA standard that COA will assume this to be an established fact? I know that the plaintiffs in the Braam case sent a letter to Neal Carson of COA on December 19, 2007 outlining their anticipated arguments against Children's Administration. My efforts to meet with you to discuss this were rebuffed. It is difficult to see how COA can view this as a matter of concern without having provided us a fair opportunity to discuss and respond to this letter.

By this letter, I request that you reverse or at least delay your decision to put the accreditation process on hold until the issues raised here are fully addressed and clarified, especially those relating to your recent reversal of past COA positions and statements on the progress made by Children's Administration towards accreditation and the nature of our working relationship with you and COA. Attached are copies of pertinent e-mail exchanges to remind you of our work together.

In order to fully address the issues you raise in today's letter and we raise in this response, it is necessary to provide appropriate background regarding Children's Administration's participation in the accreditation process and the nature and context of our recent meetings and communications.

Background

Children's Administration (CA) has been pursuing accreditation by the Council on Accreditation pursuant to 2001 legislation which required:

"The department shall undertake the process of accreditation with the goal of completion by July 2006. The department, in conjunction with a national independent accreditation entity, shall report to the appropriate committees its progress towards complete accreditation on an annual basis, starting December 2001."

The approach to statewide accreditation as jointly developed and agreed to between CA and COA is for all CA field offices and Headquarters to undergo a site visit, and then follow up with any improvements as needed, in order to be confirmed by COA as meeting COA's 7th Edition Standards for Public Organizations. While individual offices are not accredited, each office and CA Headquarters must be confirmed as meeting the COA standards required for accreditation. Once all offices and Headquarters are determined to meet the requisite COA standards, the state is then accredited as a child welfare organization. Re-accreditation is required every 4 years.

Accreditation of public child welfare organizations is a relatively new process for COA. In the past, its primary focus had been on the accreditation of relatively small private organizations. There are currently 5 state-administered child welfare agencies accredited by COA: Arkansas, Illinois, Kentucky, Louisiana and West Virginia.

Current Accreditation Status

- As of June 2007, all CA and HQ offices have completed initial accreditation site visits;
- As of January 2008, 44 offices and HQ have received notice from COA that they have met COA accreditation requirements;
- The remaining three CA field offices are actively working towards confirmation by COA. Two of those offices have submitted their corrective action responses to COA, based on their on-site review report. The last office is in the process of finalizing their corrective action response and will submit that to COA by March 10, 2008. This response is due to be reviewed by COA during the April 25th COA Commission meeting.¹
- Interim regional site visits, related to offices which completed site visits between 2003 and 2005, have been conducted in 4 regions and HQ. The written responses to COA stemming from these interim visits are to be reviewed by COA in January and February.
- CA was on track to reach the goal of statewide accreditation by spring of 2008.

CA relationship with COA

You cite our December 7, 2007 meeting in your letter. Prior to that meeting, CA's relationship with COA had been very positive. Any issues identified by CA or COA were resolved through a partnership that utilized a mutual and collegial problem solving process. CA has been asked to present at COA conferences on our efforts to achieve accreditation, as *a state* run child welfare system. Contact between COA and CA accreditation staff has occurred on a very regular basis.

Your letter does not refer to a previous meeting we had in March of 2007 in which all of the issues now raised in your letter were discussed, but in which you and COA appeared to take vastly different positions than you now do. This meeting was initiated when you indicated a desire to meet with me. Attached is a copy of your e-mail of February 27, 2007 confirming our meeting and expressing your interest in "strengthening the relationship between CA and COA" and "working in partnership" with us.

On March 15, 2007, Ross Dawson, Tim Hunter and I met with you to discuss and agree on a schedule for completing office site visits, and a process for interim regional visits for a random sample of offices that had completed initial site visits between 2003 and 2005, so that CA could finish its process and become accredited as a state. The plan and timetable for completing the remaining office's accreditation site visits was confirmed in writing and has now been completed accordingly.

The March 15, 2007 meeting appeared to us to be very productive and collegial. Attached is a copy of your e-mail of March 20, 2007 emphasizing that the time in the meeting was "very well spent" and was an opportunity for us "to discuss how CA & COA can truly forge a partnership to strengthen the quality of services delivered to kids in Washington."

In addition to confirming the timetable for completing the last office visits at that meeting, we discussed a range of issues of mutual interest. This included our concerns about consistency in the COA review and rating process and the Braam Lawsuit Settlement Agreement and expectations for meeting caseload and monthly visit requirements. In this discussion, you

¹ The response by this office was delayed due to a fire in late November that destroyed the office and subsequent flood damage from December 2007 storms that impacted their temporary office space.

expressed very clearly that:

- Accreditation and improvement is a process and that COA standards were structured in a way that allowed agencies to develop and improve over time;
- The relationship between the body seeking accreditation and the Council is one of clear feedback and partnership in attaining high standards and is not designed to be used as a “stick” in compliance matters; and
- COA did not want or seek such a role.

Within that same meeting, we discussed that the nature of change in large public organizations is “less like flipping a switch, and more like turning a huge ship”. We discussed, very explicitly, a partnership which would be grounded in a “developmental” approach to continuous improvement. You specifically offered that rather than expecting us to make immediate commitments to policy changes on items like monthly visits, that COA would be willing to accept a “commitment in principle” to move towards a policy of monthly visits, perhaps supported by a written statement of intent to reach that goal by the end of our next four year COA cycle (approximately 2012).

In discussing our plans for getting to monthly visits and reducing caseloads, I expressed the need to make sure resources were in place to accomplish policy goals. We also discussed and agreed on the plan for re-accreditation. There was agreement that the estimation of statewide accreditation in early 2008 was very feasible and that re-accreditation site visits would begin in 2009 using the new 8th Edition Standards. We further discussed a strategy for conducting the Re-Accreditation Site Visits on a regionalized basis. I raised the issue of performance based standards as opposed to published standards as a continuous improvement and feedback process that would be helpful to large organizations. You mentioned that COA was looking at a performance-based approach and also mentioned plans to bring members of large public sector agencies together to discuss issues pertinent to public child welfare.

The meeting ended with a shared sense of improved clarity and partnership. We agreed that quarterly contact between the COA CEO and the CA Assistant Secretary would be beneficial to supporting ongoing partnership and effective communication. Our first quarterly contact was arranged by CA through a conference call on July 13, 2007. The phone call was positive in tone. CA provided an update on meeting the accreditation schedule agreed to at the March meeting. The process for the interim regional site visits was also discussed. No significant issues were identified or left outstanding, including those issues you now raise in your letter.

During the summer and fall, the remaining site visits occurred as per the agreed plan and offices prepared their corrective action plans and continued to receive notification that they met accreditation requirements. The agreed regional and HQ interim site visits also took place as planned.

The December Meeting

The next meeting was arranged on short notice and with no explanation when you indicated that you would be in Seattle and would like to meet with me. Attached is your e-mail of December 5, 2007.

This meeting occurred on December 10, 2007. At the meeting your tone was very adversarial and you appeared disappointed that I included Ross Dawson, then our Director of Program and

Practice Improvement and a participant in the March meeting with me. At the meeting, you described being under extreme pressure and stated that the accreditation process for our organization had gone on “far too long”. You did not clarify the source of your pressure, although I note that the meeting occurred more than a week before the plaintiffs sent their letter of December 19, 2007 to COA. You mentioned standards which you thought our organization has had trouble meeting and wanted to know when these would be achieved. Specifically mentioned were the following:

- Monthly visits
- Caseload size
- Family assessments
- Masters level education requirements for supervisors

You wanted to know when “Washington was going to get serious about accreditation.” Further, you said that COA was not about becoming excellent but about being excellent. This was a total reversal in tone and content from earlier meetings, and our conversations about “partnership” and a “developmental” approach to continuous quality improvement. I described being taken aback by your approach and that I did not understand how this new stance toward our organization was consistent with the concept of partnership as emphasized in all of our earlier conversations. I further said that I did not understand what had changed to generate such a change in tone from our previous discussions.

Additionally, it seemed that you were taking a new and different approach to defining which COA standards are “mandatory”. You implied that unless and until we have implemented policies assuring compliance with the four items cited above, COA may not be willing to grant accreditation to our organization. This was particularly concerning, since this would seem inconsistent with not only all of our previous conversations, but also inconsistent with COA’s own standards, and with the approach COA’s Commission has previously taken in communicating with our offices in reviewing compliance and improvement plans.

By COA’s definition, none of the four standards mentioned are mandatory. Rather, each of them is a 3rd order standard within a broader series of standards. As defined by COA and as applied to every other organization we are aware of, a perceived lack of compliance on any one of these standards is not a “deal breaker” for an organization to become accredited. Rather, it is being in compliance at the next highest order of standards (i.e. the overall series of related standards) which is required in order to be considered in compliance. More specifically, the higher level series is not mandatory for either caseload standards or for the supervisor educational degree standards.

For you to now define any one of these 3rd order standards as mandatory for our organization seems squarely counter to any and all definitions we are aware of concerning COA’s standards and their implementation in the accreditation process.

This new definition, which you seemed to suggest during that December meeting, would not only be inconsistent with COA’s own definitions, it appears to create a unique set of standards which would be applied by COA only to Children’s Administration.

Following this meeting, CA felt that you had raised a number of issues that needed to be clarified. I took these so seriously that I offered to come to New York specifically to meet with you to try to clarify and resolve them and restore the collegial relationship we had long believed

existed between CA and COA. As indicated above, I also wanted to use this opportunity to discuss the letter sent by the Plaintiffs in the Braam case to COA on December 19, 2007. Attached is an e-mail chain between you and my office in which you initially agreed to this meeting and then suggested I delay making traveling plans until after we discussed the matter in a conference call.

That call, on January 9, 2008, failed to provide any more elucidation or clarification. In the call, I again expressed my willingness to fly to New York to meet with you and your response was that while New York City might benefit from my tourist dollars, the only information you wanted from Washington State was a clear and written commitment regarding meeting the standards.

In today's letter to me, you leave any casual reader with the implication that CA has not been forthcoming with COA's requests for information. This is not true. CA has tried to get clarification from you as to COA's abrupt shift in direction and my efforts to meet with you to this end have been rebuffed. In light of this, it is grossly unfair of COA to place the accreditation process on hold and to threaten to deem that CA be construed to have withdrawn from the process if it fails to meet your arbitrary deadline. Before taking such steps, COA should first consider the information set forth in the remainder of this letter and second provide CA with written clarification on the questions set at the end of the letter.

With respect to the four specific standards mentioned in the December meeting, we ask that you consider the following information:

Comprehensive Family Assessment

Our COA ratings on this standard (G8.2.02) have improved significantly over the past several years. The table below shows COA ratings on this standard for our offices, all of which have now completed COA site visits.

Year	# Offices Reviewed by COA	# Offices rated out of compliance on G8.2.02
2003	8	5
2004	12	6
2005	3	1
2006	11	1
2007	12	0

Analysis:

During our first two years of COA site visits, 11 of 20 offices (or 55%) were rated out of compliance on this standard concerning Comprehensive Family Assessments. CA then worked to improve our practice in this area. During the last two years of COA site visits, only 1 of 23 offices (4 %), were rated out of compliance on this standard concerning Comprehensive Family Assessments.

Additionally, as we have described to COA, we continue to improve our assessment and service planning procedures. We have now designed a new Comprehensive Family Assessment, with COA standards in mind, which will help us incorporate the principles of Solution Based Casework into our assessment and service planning work with families. We will implement our

new, standardized, Family Assessment tool statewide with our new automated case management information system, which is scheduled to start operation later this year.

Given the results of our COA reviews, and the progress we have made in improving our assessment procedures, we see this as an area of strength at this time, and are not sure what COA's concern is regarding this particular standard.

Caseloads

As we have discussed previously, as a public child protection/child welfare organization, we control neither:

- a) the volume of referrals of child abuse/neglect (i.e. cases) coming into our system, as we are legally mandated to provide our services to any and all clients meeting requirements for eligibility; or
- b) the level of staffing (i.e. ratio of workers to cases), because the state legislature, in partnership with the Governor's office, determines our budget, which very explicitly defines our number of staff positions (FTE's).

As discussed previously, and as documented several times for the COA Commission, we have made remarkable strides in decreasing caseload levels over the past ten years. We are keenly interested in continuing to decrease caseloads for our staff. We continue to reference COA caseload standards in our ongoing efforts to garner additional FTE's.

Monthly Visits

We have now established a policy requiring monthly visits to all children in out-of-home care which is consistent with COA standards. Pending legislative approval of our Governor's proposed budget, our policy would require monthly visits as of September 2008. Please find the enclosed letter to the Braam Panel which describes this commitment to monthly visits, along with the important caveat that implementation of the policy is dependent upon legislative approval for funding the FTE's associated with completing monthly visits (which were included in the Governor's proposed budget).

Masters Degrees for all Supervisors

Recent data shows that 46% of our supervisory staff hold MSW's or related advanced degrees. We believe this represents an increase over the past several years. During the past fifteen years, over 500 of our staff have utilized the Child Welfare Training and Advancement Program to obtain their MSW. Meanwhile, we also continue to have some supervisors in our ranks who are well experienced and highly effective, but do not happen to hold an advanced degree. We do not propose to relieve those effective supervisors from duty. Rather, as we hire new supervisors, we do consider educational level as one consideration when making hiring decisions. As with other non-mandatory COA standards, our approach to this matter has been to make reasonable and sustained efforts toward improvement. This approach has been supported by COA in the past.

In those offices where this standard has been cited as out of compliance by COA, the expectation from COA has never been that we would suddenly require that 100% of our supervisory staff across the state would hold advanced degrees. Rather, the expectation has been that we work towards an increased level of performance on this standard over time. For example, please see

the following quote from the COA Commission in their report to our Everett office, concerning this matter:

“COA recognizes that this is a long-term process and that in some geographic areas it may be difficult to recruit/retain personnel with appropriate degrees due to a lack of available candidates who possess relevant degrees. The goal of the plan should be to have a qualified workforce in place by the next accreditation review. COA does not in any way expect the agency to let go of current personnel. The expectation is the agency will revise its hiring practices and personnel development planning to increase the percentage of personnel that are qualified by degree and/or experience.” (Pre-Commission Review report, Everett — 5/3/07)

“Give a plan by which you will incrementally move towards the standard.” (Preliminary Accreditation Report 6/7/06).

In addition to the four areas cited in our December meeting, you reference some additional areas of apparent concern to COA in today's letter. As COA has not specifically raised them before, we are unclear why you choose to do so now, especially as your implication is that these concerns are factors in your decision to place the accreditation process on hold. Nonetheless, our response to these newly raised concerns is as follows:

Kinship Home Studies

We are unclear as to what COA's specific concern would be in this regard. In reviewing our performance on the relevant COA standards concerning Kinship Homes (series S21.27 and series S21.28) there appears to be only one report with any concerns raised regarding our work with Kinship Homes.

Our practice for relative home studies is virtually identical to the process we use for home studies with licensed foster homes. And, in fact, as of April 15th the two processes will be completely aligned, so the Relative Home Study will be identical to the home study conducted for licensed foster homes.

Stakeholder Participation in the CQI Process

Again, we are perplexed as to what COA's concern in this area might be. As each of our offices has worked towards meeting COA standards, they have engaged community stakeholders in the Continuous Quality Improvement process, in keeping with COA guidelines. In fact, Standard G2.2 has only been rated a concern in a total of three offices. Those three concerns were raised during our first two years of reviews. It appears that this has not been identified as a concern recently.

Risk Management Reviews

Please clarify COA's exact concern. Our Internal Control Risk Assessment and Self-Evaluation (RASE) procedures were updated in 2006. The RASE is conducted annually in each of our offices. COA standard G2.5.02 has been raised as a concern in only 5 of our offices.

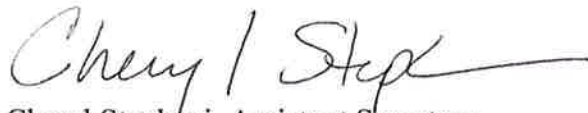
Request for written clarification to the following questions:

1. Are you in fact informing us that even if all of our offices are confirmed by the COA Commission as meeting COA standards, COA will refuse to grant accreditation to our organization?
2. Are you in fact declaring that the four 3rd order COA standards mentioned above are now, in contrast to COA's own definitions, mandatory for our organization?
3. In our December meeting, you indicated you were under "extreme pressure." Please clarify what you meant by this for us. If there was pressure applied to either you individually or COA organizationally from internal or external sources and it was a contributing factor to your change of position vis-à-vis CA, we have a right to know and openly address this issue.
4. What specific factors or concerns prompted the change in your stance towards Children's Administration? We are genuinely confused as to how "partnership in a journey towards excellence" seems to have suddenly become a unilateral demand for immediate change.

Richard, I sincerely hope that you will take all of the above information into consideration and provide Children's Administration with the necessary clarification. We have worked long and hard to achieve accreditation. This reversal in your position as we near the end of our first round of the accreditation journey is extremely troubling and has implications not only for Washington State but for any other child welfare system that may be interested in pursuing accreditation through your organization in the future.

As we await your response, we will continue to work aggressively towards statewide accreditation, which we have strived towards for over five years now. We hope and trust that we can come to clear agreement between our organizations, but given the tone and content of the December meeting and today's letter, we need both further clarification as requested above and some indication on your part to work with us as partners with an interest in improving child welfare practice in Washington State. Without such a willingness on COA's part, it is difficult to see how the steps you are taking can in any light be construed as appropriate for or in the interests of children and families in this State.

Sincerely,



Cheryl Stephani, Assistant Secretary
Children's Administration

Enclosure

cc: Christine O. Gregoire, Governor
Robin Arnold-Williams, Secretary, Department of Social and Health Services
Timothy Hunter, Accreditation Program Manager, Children's Administration

From: Richard Klarberg [mailto:Rklarberg@coanet.org]
Sent: Tuesday, February 27, 2007 8:38 AM
To: Stephani, Cheryl S.
Cc: Dawson, Ross (CA); Allison Blake; Hunter, Timothy J
Subject: Our meeting

Dear Cheryl:

I am looking forward to the opportunity to meet with you on March 15th from 3:00 until 5:00 at your office in Olympia.

Ross asked that I set forth my "agenda". That seems somewhat more formal than what I envisioned when I suggested that we meet. I would prefer that we view this meeting as an opportunity to get to know each other and to collegially discuss opportunities for strengthening the relationship between CA and COA. I am especially interested in learning about your plans to proceed with reaccreditation, especially with regard to ensuring that the policies comply with the standards, that there is sufficient resources available for coordinating the process and that there is support for involving the regional administrators.

I would also like to explain how we plan to proceed should you seek reaccreditation. We have developed and had significant success with a regional approach to the reaccreditation process. I think that it will prove to be exceptionally valuable in Washington.

Perhaps most importantly, I would like to establish a process for you and me to meet by telephone at least quarterly to discuss progress and concerns.

I look forward to seeing you and to working *in partnership* with you to provide the very best services for the vulnerable children Washington.



Richard Klarberg
President & CEO

From: Richard Klarberg [mailto:Rklarberg@coanet.org]
Sent: Tuesday, March 20, 2007 7:18 AM
To: Stephani, Cheryl S.
Cc: Dawson, Ross (CA); Hunter, Timothy J
Subject: Thanks!

Good morning Cheryl,

Just a quick "thank you" for meeting with me on Thursday. I thought that our time together was *very well* spent. It gave us both a chance to discuss how CA & COA can truly forge a partnership to strengthen the quality of services delivered to kids in Washington.

Let's stay in touch and continue to be mutually supportive. In that regard, I will begin to pull together a group of leaders from the public sector to discuss some of the very long term societal and geophysical issues that will inevitably directly or indirectly impact the ability to successfully meet the needs of vulnerable individuals. Your participation will definitely enrich the discussion. More on this as it evolves.

Again, thanks and I look forward to seeing you soon again.



Richard Klarberg
President & CEO
Council on Accreditation
212-871-1230

Stephani, Cheryl S.

From: Richard Klarberg [rklarberg@coanet.org]
Sent: Wednesday, December 05, 2007 8:49 AM
To: Stephani, Cheryl S.
Subject: Meeting

Cheryl-

I unexpectedly will be in Washington on Monday and Tuesday of next week. I have appointments in the afternoon of both days in Seattle but could meet with you first thing in the morning either day. I think that it is important that we speak and I would prefer doing it in person. Please let me know. Thanks and sorry for the short notice.

Richard

From: Richard Klarberg [mailto:rkklarberg@coanet.org]
Sent: Thursday, January 03, 2008 11:35 AM
To: Ertman, Denise I.
Cc: Stephani, Cheryl S.
Subject: Re: Follow-up to our December conversation

Great. I'll call at her at 8 sharp (your time). Thanks.

From: "Ertman, Denise I." <ertmadi@dshs.wa.gov>
Date: Thu, 3 Jan 2008 09:13:28
To: "Richard Klarberg" <Rklarberg@coanet.org>
Cc: "Stephani, Cheryl S." <StephCS@dshs.wa.gov>
Subject: RE: Follow-up to our December conversation

Richard - Cheryl is available for a phone conference on January 9th from 8:00 a.m. - 9:30 a.m. (11:00 a.m. - 12:30 your time).

From: Richard Klarberg [mailto:Rklarberg@coanet.org]
Sent: Thursday, January 03, 2008 5:17 AM
To: Ertman, Denise I.
Cc: Stephani, Cheryl S.
Subject: RE: Follow-up to our December conversation

Denise - I would prefer the 18th or sooner. Before Cheryl completes her travel plans, I think that it would be useful to have a brief telephone discussion. I would not want her to needlessly incur the expense and wear & tear of traveling here. Please advise me as to her availability on January 7, 8 or 9.
Thank you.
Richard

From: Ertman, Denise I. [mailto:ertmadi@dshs.wa.gov]
Sent: Wednesday, January 02, 2008 7:51 PM
To: Richard Klarberg
Subject: FW: Follow-up to our December conversation

Richard - Cheryl would be able to meet with you on January 18th or 21st. Please let me know if either of those dates will work for you. Also, let me know if there is someone you would like me to contact to coordinate arrangements.

From: Stephani, Cheryl S.
Sent: Wednesday, January 02, 2008 9:16 AM
To: Richard Klarberg
Subject: RE: Follow-up to our December conversation

Thanks, Richard. I hope that you are feeling better. I will have Denise start working on scheduling a trip. There are a few things on my calendar that I can't move around, so I will have to schedule around them.

From: Richard Klarberg [mailto:Rklarberg@coanet.org]
Sent: Tuesday, January 01, 2008 8:54 AM
To: Stephani, Cheryl S.
Subject: RE: Follow-up to our December conversation

Cheryl:

I am pretty much free for the next few weeks. Let me know what fits your schedule, and I'll work to accommodate that.

Best wishes for the New Year.

Richard

From: Stephani, Cheryl S. [mailto:StephCS@dshs.wa.gov]
Sent: Monday, December 31, 2007 7:20 PM
To: Richard Klarberg
Subject: Follow-up to our December conversation

Richard, I would like to come and meet with you as a follow up to our December conversation. I have also received a copy of a letter sent to you by Casey Trupin, an attorney for the Braam plaintiffs. I would appreciate a chance to meet with you and discuss that issue as well. When will you be available to meet?



STATE OF WASHINGTON

**DEPARTMENT OF SOCIAL AND HEALTH SERVICES
P.O. Box 45040, Olympia, Washington 98504-5010**

January 11, 2008

Braam Oversight Panel
John Landsverk, Chair
c/o Carrie Whitaker
Box 354900, 4101 15th Avenue Northeast
Seattle, WA 98105-6299

Dear Chairman Landsverk:

Subject: Monthly Visits

I would like to update you on recent developments that directly impact Children's Administration's plans to provide health and safety visits for children in out-of-home care. As you know, the Panel and Children's Administration have not been able to agree on a schedule to phase in these visits in the past. However, Governor Gregoire in her supplemental budget has provided additional funding to accelerate the hiring of new social workers for the purpose of providing these visits. In addition, now that we have completed and received our workload study, Children's Administration is in a position to make reasoned and fact based assessments of the workloads and day to day responsibilities of our social workers in the field who will be called upon to implement this policy.

As a result of these developments, we are amending our previous proposals to the Panel calling for a phase in of monthly visits based on the age of the child and type of placement. Instead, our six regions will begin providing monthly visits to all groups of children in out-of-home care on September 1, 2008. While our annual performance will of course have to be measured in accordance with the benchmarks of the Panel's Implementation Plan, this should ensure that the department is in compliance with the terms of the Settlement Agreement and Outcome 5 of the section on Unsafe/Inappropriate Placements in the Implementation Plan.

There is one important caveat. We have always identified our ability to provide monthly visits for all children in care as a resource driven issue and our plan to expand visits for these children on September 1 is contingent on this provision of the Governor's budget being enacted by the Legislature. While we are hopeful that this will happen and will support the proposal, we won't know for sure if we will have the necessary resources and capacity to expand our policy to cover all groups of children by September 1 until we see the final budget at the end of the session. If the amount provided in the supplemental budget for accelerated hiring of new social workers is reduced or eliminated, we will present a new proposal to you at that time.

Assuming it passes, we will then of course have to hire, train and deploy the new social workers, but I anticipate that our September 1 start date will give us sufficient time to do this. Additionally, in the next few months, our Regional Administrators will be developing regional work plans for implementation of this policy. They will be utilizing the results of the workload study and working closely with field staff and other stakeholders to look for ways to maximize efficiency and streamline non-essential tasks to assist in the implementation of this policy. We will update you and interested stakeholders on the progress of these endeavors at the next Panel meeting.

As you know, documentation of visits has been an issue in the past with the result that the Foster Parent Survey has been used as a proxy measure to date. Once FamLink is operational, administrative data should be timely and accurate and our FamLink design team is working to ensure that this will happen. Until then, we will continue to provide you with the best data we have. You requested additional information on alternate measurements for health and safety visits and other face to face contacts with children in care and we will be providing it to you in the near future. However, I wanted to let you know now of our decision to extend health and safety visits to all children in care on September 1, 2008.

Thank you for your past collaboration on this issue. Please let me know if you have any questions.

Sincerely,



Cheryl Stephani
Children's Administration

cc: Jeanine Long
Jan McCarthy
Jess McDonald
Dorothy Roberts
Steve Hassett, AAG
Plaintiffs' Counsel